

EXHIBIT 12

I, Chesley Maddox-Dorsey, respectfully state as follows:

I am President of Access.1 Communications Corp. I am providing this Declaration in support of the proposed regulations regarding EEO enforcement.

I have worked in and around the broadcast industry since 1983. From 1983-1987 I provided senior bank financing to many broadcasting companies, for Ameritrust Corporation. From 1987-1992 I had a financial consulting firm, Chesley Maddox and Associates, where I consulted with many companies through the dire days of the late-80's and early 90's. In 1992 through 1998 I worked as an investment banker to the Communications industry, and just recently joined Access.1 Communications Corp, as President. Access.1 is the parent company of National Black Network and WWRL-NY.

There are far to few minorities and women involved in the management and everyday work positions at radio stations. African Americans spend more time consuming radio programming than their general market counterpart, 40.6% vs.35.6%, (Source: Radio Advertising Bureau, 1994). The lack of African American representation in any positions in radio stations is even more noticeable on a proportionate basis. Anything that can be done to increase the opportunities available for the number of minorities that want to get involved in the broadcasting business is important.

An effective EEO program is crucial in order to increase diversity in radio stations. Stations tend to be, in many cases, fairly monolithic, particularly with this latest wave of consolidation bringing so many stations in one market under common ownership. The wider the selection and the larger the number of applicants one has to choose from, the better chance one has of getting a high quality employee. I think that it's important to have as many specific recruitment programs in place to get information out to a broader range of people. In other words every attempt to bypass "the old boy network" should be applauded. Intuitively I believe the FCC's EEO enforcement has enhanced employment and mentoring opportunities for women and minorities. I shudder to think where the numbers of job applicants and actual minorities working in the industry would be without any concerted effort being made.

The ability of broadcasters to recruit and retain minority job applicants is directly related to the effort they put forth. While some broadcasters do put

forth a lot of effort, many broadcasters simply do not attempt recruitment unless it is for on air staff at a black formatted station. The opportunities for minorities on non-ethnic formatted stations are still fairly limited.

Most of the non-minority male broadcast executives, journalists or personalities I have worked with got their start in entry-level positions. Generally, they developed a good working relationship with their manager who in many cases became their mentor. This relationship assisted in facilitating their grooming and development and very likely led to them learning through their contacts about the "better" career move. Most of the women and minority owners I have worked with got their positions by being entrepreneurs. Women and minority have frequently had to buy their way into the business. Often times there were no employment opportunities for them in the seventies and eighties. The option for them to be able to get a job and progress in the same method available to their White counterparts was pretty much ruled out. As an alternative, with an excellent performance track record they could raised limited amounts of capital from outside sources and started their own companies.

This class of women and minority entrepreneurs have created a lot of job opportunities for younger people, minority and non-minority, to move up through the ranks. Single handedly, if you look at the numbers, minorities generally hire the majority of the women and minorities in the business. I think possibly because they had to force their way into the industry, that they are probably particularly sensitive to these issues. On the other hand, the typical skilled non-minority executive is probably somewhat less sensitive to the difficulties of women and minorities to break into the ranks. Thus, the FCC's EEO policies are very important in creating a more sensitized environment.

Exposure to a wide variety of people makes anyone more knowledgeable, more intelligent, and more sensitive. By that I mean that the staff's exposure to minorities and women even at a radio station that targets a predominately White audience, by definition should make everyone more sensitive and more knowledgeable. In day-to-day interactions an interracial staff paves the way for additional care and sensitivity in discussing daily work, political and life issues; on the air and in the station.

All interactions within a broadcast facility between station employees can influence the portrayal of issues on the airwaves. To put it simplistically, if

you know someone and you hear a story that could have a stereotypic slant, but you have a personal interaction with someone with a different perspective, then you are more likely to question it. That personal interaction takes place at the coffee machine, at the water cooler, in a meeting, on a sales call, or discussing programming. These interactions make you question whether you are getting both sides of the story.

Consider, the biggest radio news story of the last 2 or 3 day, the Greaseman's comments about the racist murder in Texas, Howard Stern's lack of sensitivity pales by comparison. Stern's African American female sidekick, Robin, could certainly be seen as contributing to his broader appeal. Both Doug Tracht and Howard Stern are "shock jocks" and use a lack of sensitivity to attract audiences. Stern is seen as more an equal opportunity offender as oppose to Tracht who is viewed as merely offensive and dangerous and of course unemployed. Perhaps greater interaction with women and minorities would have benefited his career development.

It is crucial to financial institutions that broadcast owners have broadcast operating experience. The lack of the FCC's EEO enforcement could be perceived as hampering opportunities for potential minority owners to gain necessary on-the-job experience. The lack of opportunities to meet and mingle with potential station sellers and develop mentors could impede their ability to find or even recognize qualified job applicants to staff their facilities when they are successful in the ownership realm. To be an effective broadcast owner, you have to have a blend of skills that you cannot just learn in a textbook. Mentoring and grooming is critical. This can only be done on-the-job.

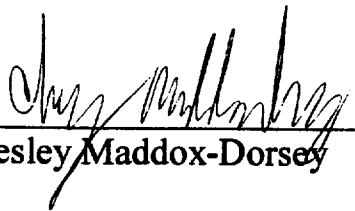
In previous years, the lack of minority broadcasters was due to lack of access to capital and the lack of operating experience. Currently there is substantial amount of capital available. There is a lack of stations for sale at reasonable prices. However, there is an overwhelming tendency for owners and brokers to sell to people who are familiar to them. There still appears to be a residual "Black-tax" on buying stations. If you are minority or female competing to buy a station with someone who is neither, frequently you have to pay a premium to even get in the game. Again, the lack of interaction affects both women and minorities in subtle but costly ways.

I have mentored a number of people during the course of my career, many of whom were women and minorities. Most of the successful broadcasters I

know got to their position by having a personal "board of directors" who mentored them throughout their career. Whether it was a board of three or twelve, there were several people that groomed them to help them get to the spot where they are now. This "Board" could be comprised of executive assistants, traffic directors, program directors sales people and even the general manager. There are never enough opportunities for mentoring and supporting minorities.

This statement is true to my personal knowledge and is made under penalty of perjury under the laws of the United States of America.

Executed March 3, 1999



Chesley Maddox-Dorsey

EXHIBIT 13

Declaration of Joseph Madison

I Joseph Madison, respectfully state as follows:

I am the producer, host and programmer of a public affairs radio talk show in the Washington DC area. I have worked in the broadcasting business for 25 years. I also mentor minority broadcasting professionals and students on a regular basis.

I think that the EEO policy needs stronger enforcement mechanisms to ensure that owners, managers and executives do not ignore their obligation to apprise minority job seekers of employment opportunities. EEO enforcement can ensure that minorities and women are not tracked into positions which give no opportunity to advance into upper echelon positions.

We have been asked what, if any, impact the EEO has had upon programming diversity and opportunities for African Americans. Perhaps the best way for me to phrase this is by citing the experiences with ineffective EEO programs. I have seen the impact on friends' careers when they worked at stations with lack of genuine EEO compliance. They experienced minimum advancement, minimum job satisfaction and a great deal of frustration. They expressed that they were treated and looked upon as tokens and have no genuine opportunities to discuss and tackle these issues within these

companies. In some firms I knew of which lacked compliance, there were no African American males, and women experienced the dreaded glass ceiling.

In terms of the impact on programming content and portrayal of minorities, a fairly well integrated firm has a positive impact on the company's relationship to the community. A well mixed workforce therefore enhances the company's relationship to the community to which it is licensed and enhances program content. The program content gains a certain cultural and social awareness that programming by a homogenous broadcasting workforce usually does not have.

When major issues come up, different cultures will react differently. For instance, I once worked in the Detroit market, which has a 50% minority population. Yet the hired staff at my station did not even live in the city. It led to a Detroit versus us mentality which was reflected in the hostile, negative programming that often unfairly portrayed minorities. The focus of stories relating to minorities was crime, in a 'if-it-bleeds-it-leads' approach. On the other hand, issues related to politics, major African American leaders and community concerns received paltry attention. This demonstrated to me that one needs an integrated workforce at all levels. With an integrated workforce, the result is less harsh. Integration works at all levels, although interaction among programming staff is

more essential. I enjoyed being able to make sure they cover crucial issues within the black community and therefore contributing to my firms' success. I, for one, always push for issues and perspectives I think are either ignored or about which the staff is not knowledgeable. But, this type of workforce is not achieved without a solid and well enforced regulation to encourage firms to make the right decisions.

By improving hiring opportunities for minorities, EEO also makes it possible for individuals such as myself to provide mentoring to students and newcomers. I find that young minorities in the broadcasting profession would otherwise lack such a resource. Most of the White managers I know very seldom come into contact with minority youth. This is not due to prejudice on their part. They simply don't have cultural ties with the community. With a minority presence in broadcasting, aspiring professionals now have resources for advice and inspiration.

Although the EEO policy created moderately decent improvements in the opportunities of qualified minority applicants, it could use a more credible enforcement process. The lack of aggressive enforcement has impeded opportunities for minorities. Furthermore, it has failed to reduce excessive reliance on old boys network which permeate the broadcasting culture. Instead, individuals with no

experience are given on-air, prime positions in key time slots (two prominent examples are Oliver North (WRC), Danny McLain (WXYZ, Detroit)) over and above African American, Hispanic or other minorities who have been working at stations in designated weekend slots for years.

I notice this phenomenon often. Most owners, managers, and executives ignore EEO as it relates to broadcasting because there is really no muscle in the enforcement of the policy. They do not make a good faith effort to recruit from minority communities. For instance, during my years as an executive for two major market radio stations, I noticed human resource departments or personnel departments that did not even know where to recruit potential and minority employees. They were not even aware of historically black colleges or that some of these colleges had outstanding communications departments. They certainly never recruited at these schools. When I came to Washington, D.C. I was shocked when one programming director told me that there were no qualified African American to do talk radio. This was only four years ago! But in truth, it should be no more difficult to find and retain minority applicants than it is to obtain white applicants. As there is in fact no shortage of trained and trainable broadcasting talent in the African American community. I think the facile statements made by hiring personnel reflects the ease with which one can eschew EEO responsibilities.

Certainly, any measure to exempt entry-level positions or stations with fewer than ten employees would be a step in the wrong direction. Most people who have been in the business in the long time know that one usually starts in small companies, small towns and small markets. Broadcasting professionals tend to start at the very bottom small stations and work their way up to mainstream stations. Very few people start at the top or in the middle. If Hispanic or African-Americans study and live in states such as Iowa, where there are few black owned or Hispanic stations, their only resort is to seek employment with smaller, usually family owned stations.

In closing, I reiterate that EEO is still necessary and requires a stronger commitment to enforcement from the Commission. The EEO policy helps to attract the best talent in a particular community, and not just the better connected. It provides opportunities for those who have not gained access to what has been essentially a word-of-mouth, closed community.



Joe Madison

February 27, 1999

EXHIBIT 14

STATEMENT OF PAULA MADISON

I am currently Vice President and News Director of "NewsChannel 4," WNBC, New York, New York, a position I have held since March 1996. Prior to my promotion to News Director, I served as the station's assistant news director for seven years. This document reflects my personal views, opinions and experience and is in no way intended to represent the views or opinions of my employer, the National Broadcasting Company, Inc.

I began my career in journalism in 1974, on the print side of the business, working as a newspaper reporter for the Syracuse Herald Journal in Syracuse, New York. In 1980, I joined the Fort Worth Star-Telegram, Fort Worth, Texas, as an investigative bureau reporter. I later served as the assistant city editor at the Dallas Times Herald before making the transition to television news.

In 1982, I began my career in television news as community affairs director at WFAA-TV in Dallas, where I later served as news manager. From 1986-87, I was the news director at KOTV-TV, Tulsa, Oklahoma. From 1987-1989, I was the executive news director at KHOU-TV in Houston.

Although I did not begin my career in broadcasting in an entry-level position, most of the professional broadcast journalists whom I know started in entry-level positions such as production assistants and researchers.

Diversity plays an important role in how program decisions are made at NewsChannel 4. Our news department is very diverse: the decision-makers who sit at the table are black, white, Latino, Asian-American, male, female, Gen X'ers, eligible for retirement, first-generation Americans, gay, straight, city dwellers, suburbanites and mostly New York-area natives. The process works this way: the planning manager works with the reporters to identify stories which, in our news department, are heavily weighted towards issues rather than spot news. The planning manager then presents the story ideas each afternoon during the planning meeting which includes the senior news managers and the assignment managers. We decide which stories are "green-lighted" for coverage the next day. The next day, the assignment manager runs the morning news meeting and presents to the senior news managers and the newscast producers which stories we are actually covering that day. At every point in this process, there is a diverse group of people making the decisions, and the role of race in any of our stories is discussed regularly and openly throughout our staff.

I have personally mentored, trained and supported hundreds of minorities during the course of my professional career.

Paula Madison
3/16/99

EXHIBIT 15

DECLARATION OF SHARON PEARL MURPHY

I, Sharon Pearl Murphy, respectfully state as follows:

I am providing this Declaration on behalf of the African American Media Incubator (AAMI), which I serve as Executive Director and Operations Manager. AAMI was founded in 1995 and is located at 2164 Wisconsin Avenue N.W. in Washington. It is the nation's first African American broadcast training school. Of our 48 graduates since our first class of 1996, 39 have found jobs in the broadcasting industry.

AAMI, which is open to members of all races, was created to offer training and job placement primarily for African Americans and other minorities in the radio industry. Thus, AAMI affords opportunities for those who otherwise would not receive such specialized training and access to viable jobs in broadcasting. AAMI provides a valuable career development option for those who wish to learn a broadcasting trade but cannot afford the tuition and fees of a college or university school of communications.

In addition, we hold community seminars to train African American owned businesses to use radio advertising effectively. We do this because we recognized that when radio stations begin to see African American owned businesses as an attractive market for airtime, the stations will treat African American job candidates more seriously and will begin to cover issues critical to the African American community with greater depth and sensitivity.

An exemption of "small" stations from EEO compliance would severely burden African Americans, such as AAMI's graduates. Our graduates often receive employment in "small" stations because these stations require less experience than larger stations and thus are more likely to provide job opportunities to those just

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entering the industry. We advise our students that they must be willing to sacrifice and work at "small" stations -- if that's where the jobs are. The proposed exemption would foreclose a primary source of entry level employment opportunities.

AAMI's experience demonstrates the importance of targeted recruitment in securing opportunities for minorities seeking to enter the industry. Overwhelmingly, our students have secured employment at companies which regularly let AAMI know when jobs were open. In these instances, our students were on notice that they could file timely applications, and that their applications would be considered on the merits. Almost without exception, that is how our students have secured employment. It has been very rare for our graduates to secure employment at stations that have not bothered to recruit them, because our students are not part of the "old boy network". They have no way to know when a position becomes available, unless they learn of the opening because the company recruited with us.

Some of the companies that regularly and successfully recruit with AAMI are large ones, such as CBS and Radio One. These are successful companies, and I trust that part of their success owes to the fact that they cast the widest possible net to identify talented potential employees.

February 12, 1999



Sharon Pearl Murphy

EXHIBIT 16

DECLARATION OF EDUARDO PENA

I, Eduardo Peña, respectfully state as follows:

I am the Communications Counsel for the League of United Latin American Citizens (LULAC), a member of LULAC's National Board of Directors, and LULAC's Past National President (1979-1980). With 100,000 members in 44 states, LULAC is the largest membership organization of Hispanic Americans in the United States.

LULAC has long considered access to the electronic media to be a matter of the highest priority for Hispanic Americans. A stranger to our country, watching the evening news on television or scanning the radio dial, would scarcely realize that one out of nine Americans is Hispanic. Most non-Hispanic Americans know very little about the history, culture and aspirations of Hispanic Americans. Too often, the mass media has perpetuated stereotypes of Hispanics as a "horde", a "tide" of "illegal immigrants" who will "overrun" American borders and "steal" jobs which are supposedly the birthright of White Americans. Fortunately, many Hispanics employed in broadcasting, using the access and interactions they enjoy with other broadcast staff members, are able to question these stereotypes and motivate their employers to present other views. That is why the EEO Rule is most needed. Hispanic broadcast owners have been proud to comply with the EEO Rule.

Any cutback in EEO enforcement would severely burden discrimination victims; job referral sources, including particularly community groups which assist minorities to gain secure employment in broadcasting; job applicants; broadcasters innocent of discrimination, and broadcast listeners and viewers. I will discuss these affected groups seriatim.

1. Discrimination Victims

As the EEOC's past Director of Compliance (1970-1979), I know that the absence of any meaningful EEO compliance data renders it virtually impossible for a civil rights enforcement body to identify likely discriminators and hold them accountable. Discrimination victims are usually unaware that they are discrimination victims. Employers hardly advertise this fact. Thus -- quite apart from the fear of retaliation infecting the labor force in a relatively tight-knit industry -- it's not surprising that there are few individual complaints of discrimination from Hispanics against broadcasters.

But today, if someone suspects that she has been discriminated against by a broadcaster, she can at least examine the station's public file and review EEO filings. From these documents, a person suspecting that she might be a discrimination victim can at least get a sense for whether the EEO activity the licensee says it undertakes is realistically tailored to the job market and to the station's labor requirements. If referral sources are identified in Form 396, the person suspecting discrimination can call those organizations as references to determine whether the licensee has been genuine and consistent in its dealings with the referral source. This research will often enable a person suspecting discrimination to either realize that her suspicions are justified or, on the other hand, realize that her suspicions are unwarranted and that any adverse employment actions she has experienced are likely due to nondiscriminatory factors. In this way, the existence of Form 396 helps discrimination victims decide whether to proceed, and helps

innocent broadcasters avoid needless and unfortunate EEOC charges or FCC complaints.

Without any meaningful information on Form 396, no person suspecting that she is a discrimination victim will have an independent basis for evaluating whether she is in fact a discrimination victim. Moreover, a genuine discrimination victim complaining to the EEOC or the FCC will have little evidence with which to make out a case, and the EEOC or FCC will have little basis for determining whether the licensee is discriminating. Thus, the elimination of meaningful EEO reporting would profoundly burden discrimination victims.

2. Job Referral Sources

Every FCC order imposing a conditional renewal on a broadcaster contains a footnote directing the broadcaster to contact minority and women's organizations to obtain their assistance in identifying qualified candidates for employment. These organizations are truly the FCC's and EEO-sensitive broadcasters' silent partners in EEO compliance.

Regrettably, it's inevitable that a cutback in EEO enforcement by government agencies will lead to an increase in discrimination. No amount of jawboning will convince someone with a propensity to discriminate that the government's intentional action removing a protection against discrimination is not a signal that the government considers discrimination to be a low priority.

Thus, a reduction in EEO enforcement will lead to a reduction in broadcasters' notices to Hispanic organizations seeking applicants for specific job openings. Organizations such as local LULAC councils will thus be at a severe disadvantage when

a qualified person comes to them for assistance in securing broadcast employment. Instead of being able to refer to routine postings of specific jobs, LULAC councils will have to telephone the placement directors of each station to ask them, one by one, if they have a job open. This is profoundly inefficient and expensive. It's patently unfair to expect volunteers to do this.

Furthermore, the absence of meaningful EEO reporting will make it impossible for a local community organization to make an informed judgment as to which broadcasters are making a genuine effort to seek out and employ minorities. Local organizations do not waste time sending minority job seekers on a fool's errand to visit employers uninterested in hiring minorities. Without EEO reporting data, a community group cannot know which broadcasters are or are not promising sources of jobs for minority candidates.

Consequently, the elimination of EEO reporting will impose very significant burdens on job referral organizations.

3. Individual Job Applicants

Minorities seeking employment are likely to waste considerably more time in job searches if EEO enforcement is reduced. Reduced EEO enforcement facilitates discrimination. Consequently, minorities will spend more time, money and effort filing useless job applications with stations unwilling to employ them.

The EEO Rule's main focus has been requiring broadcasters to notify community groups whenever jobs are open. Without EEO enforcement, when minorities use the resources of a community group in their job searches, they will find those community groups less informed about which jobs are open and which stations are uninterested in hiring minorities.

Thus, by making discrimination easier and making the process of seeking a job in broadcasting more difficult, a reduction in EEO enforcement would discourage minorities from seeking employment in broadcasting and will profoundly increase the time and cost burdens on those minorities who do wish to continue to seek employment in broadcasting.

4. Broadcasters Innocent of Discrimination

Public review of written EEO programs protects innocent broadcasters from erroneous allegations of discrimination. With access to recruitment data, citizen groups will not have to use guesswork, anecdotal information and rumors to ascertain which broadcasters might be EEO noncompliers. Instead, they will have hard evidence separating compliers from possible discriminators. Broadcasters innocent of discrimination would be much less likely to be caught up in the net of good faith but unsupportable petitions to deny and informal objections.

The EEO Rule also assists broadcasters in securing a steady flow of qualified job applicants. Any greater incidence of discrimination will inevitably discourage good and talented people from seeking careers in the field. This brain drain from broadcasting will most seriously burden EEO compliers, who genuinely desire to take advantage of all sources of talent irrespective of race.

5. Broadcast Listeners and Viewers


The FCC's EEO program was designed to promote diversity of voices by insuring that the staffs of broadcasting stations are integrated. Employee interactions are the tributaries to the

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stream of ideas powering the information business. The Supreme Court recognized this too. NAACP v. FCC, 425 U.S. 662, 670 n. 7 (1976).

More discrimination and a reduction in minority employment virtually guarantee the resegregation of the airwaves. A greater diversity of viewpoints, and particularly the addition of minority viewpoints, strengthens our nation's public discourse.

With the loss of the minority ownership policies, the reduction-in-progress in the number of minority owned stations, and the media concentration being spawned by the Telecommunications Act, the FCC's only remaining pro-diversity protection is the EEO Rule. Listeners and viewers expect and deserve to receive the full fruits of the First Amendment from their government-licensed radio and television spectrum.

Eduardo Peña

February 25, 1999

EXHIBIT 17

I, Russell Perry, respectfully state the following:

I am CEO of Perry Publishing & Broadcasting Company, Inc. I am providing this Declaration in support of the proposed FCC regulations regarding EEO enforcement.

Formally a publisher for 29 years, I am entering my sixth year as a broadcast owner in the state of Oklahoma.

Without FCC EEO regulatory enforcement, it is likely that minorities and women would rarely be heard or seen. EEO provides opportunity for all parts of society so that all can have a fair and equal opportunity in the media. The good-old-boy network is working, as usual, but its working with a FCC-driven monitoring force. Without policing, employment opportunities would not exist for minorities and women. It is difficult to retain minorities within the media because many question why they should pursue a career in media when it is obvious broadcasters are not hiring. The industry has not encouraged minorities to apply for existing employment opportunities.

In my state of Oklahoma, prior to minority broadcast ownership, there existed no minority employment opportunities. My company, in Oklahoma City, has been the greatest media employee feeder company for the broadcast television industry here. Prior to our ownership, which provided mentoring and creating opportunities for minorities, they had no place to train. Our universities were training them, but they had no place to obtain on-the-job experience. For example, on our morning talk show, , we have hired five minority females as co-anchors, over the last five years. Each one has gone on to television within a year. Prior to Perry Broadcasting, you did not have this minority employment opportunity. In this market, which ranks 53rd in size, the major television stations wait until we screen, train and expose minority media talent, before recruiting them.

If you monitor all the broadcast companies within Oklahoma, you will likely find that they all fall short on having an effective EEO program. They comply with the FCC. EEO documentation requirements, but there has been little monitoring to insure effective compliance. People who are using federal airways and federal dollars are not openly ready to expose their lack of support for EEO regulations, which is subtly seen by the lack of hiring minorities.

You may not hear the in-house complaints. Minorities being employed by a non-minority broadcast company, who seeks a consistent paycheck, are not comfortable with raising minority issues because of the threat of repression or dismissal from employment. As such, I believe it is imperative that the FCC fully supports increased minority broadcast ownership, because Minority owners present a different and necessary view of issues.

It is extremely expensive to acquire a station in any major market. For example, I have an AM in Oklahoma City, which has the largest black population in the state. The last three FM stations sold here were bought by major conglomerates. We need to find a mechanism to increase minority ownership. The 1000-watt FM stations that are being proposed for sale is a good example of what can be done. These should be commercial stations, to meet the needs of diverse communities. Minorities need an equal playing ground, with reasonable competition, for ownership opportunities, in order to address their populations need to have a voice and be heard.

Eighty percent of the individuals I've mentored have been minorities. For example, the University of Oklahoma, a large state university, has a broadcast journalism school. However, the on-campus radio station was generally not available for student internships. Our company offered more internships in broadcasting than the university.

The industry does not provide sufficient mentoring and support for minorities. Prior to my broadcast ownership, I do not know of one white-owned station, in this market, which has offered internships to any minorities.

This industry needs some strings attached to it, because these airwaves belong to the people. With federal controls and further stipulations, it encourages those individuals to act in a manner that is beneficial to all people.

This statement is true to my personal knowledge and is made under penalty of perjury under the laws of the United States of America.

Executed 2/22/72


Mr. Russell Perry

EXHIBIT 18

DECLARATION OF DANIEL SCHECTER

I, Danny Schecter, respectfully state as follows:

I feel that it is not very difficult for broadcasters to generate and recruit jobs for minorities. If the will is there, then its very possible. There are lots of qualified minorities in the industry. If minorities were encouraged to apply and were trained properly then they would have more of an incentive to work in the industry. Its difficult however, to get minorities in the telecommunications field because the industry functions like a club, dominated by white males, with a certain mentality and culture. Clearly, there is not enough public service commitments to minorities.

My company is very global in context, therefore we make a pro-active efforts to incorporate diverse programming and recruit minorities and women. As an industry however, more of an outreach effort must be made to attract and retain minorities. This is why its important to have EEO rules enforced, because it adds much needed pressure on the white executives to hire a diverse workforce; in its absence, there is a dearth of minority representation in the field.

White broadcasters that interact with minority staff members have a greater tendency than not, to cover issue affected minority communities. As a practical matter however, new managers are not sensitive to minority issues, and therefore do not generally cover these matters. For example, if black producers are with white correspondents, there is likely to be

more coverage on minority issues due to the interracial dimension of the situation. From my personal experience, the minorities that I have interacted with on the job have had an influence on my approach to programming decisions. This was the case in a series we did on South Africa. Our goal there was to provide South Africans with the opportunity to report on their own situation. This provided a "bottom-up" perspective on the story.

On the issue of training and mentoring, minorities often do not have the opportunities and resources as there white counterparts. They receive little encouragement from others in the industry. Unfortunately, the people in the industry do not offer sufficient opportunities for mentoring, and at times if a minority asks for support they seldom receive it; the process is very intimidating. The industry need to do a better job of support the efforts of minorities entering the field.

March 16, 1999



Danny Schacter

** TOTAL PAGE.23 **

EXHIBIT 19

STATEMENT OF ROKIA SMITH

I am currently a Research Analyst at WNBC in New York. This document reflects my personal views, opinions and experience and is in no way intended to represent the views or opinions of my employer, the National Broadcasting Company.

In my junior year in high school, I was selected as an intern through the Emma L. Bowen Foundation for Minority Interests in Media. During the next five summers, and through out each academic year, I was hired as a paid intern in the Daytime Programming and Music Departments of ABC in New York. After graduating from college in 1997, I worked briefly in the Radio Industry at Interep, a national radio sales firm. The following year, I was hired by WNBC for my current position.

Throughout my time in the media industry (seven years thus far), it was my understanding that most individuals, including myself, must start from "the bottom," and work their way up the proverbial ladder. Such was the case with the General Manager and President of WNBC, Dennis Swanson. The Director of the Foundation for which I served as an intern, Betty Elam, has also related her own stories of having to begin in the broadcasting industry from "square one." In terms of percentage, I would say 50% of the people with whom I interact began their professional careers in the media from an entry-level point.

Neither my colleagues, nor I have ever worked in a professional environment containing ten employees or less.

In my opinion, programmers are more sensitive to minority views and issues when they are in direct contact with colleagues who represent these groups. I believe that it is important for the decision-makers to come from a diverse pool to help ensure that issues of race are properly addressed on the air.

I believe that WNBC (the only broadcasting station for which I have been employed) does a good job of providing coverage of issues relevant to minorities. During each summer, the station exclusively broadcasts the Puerto Rican Day Parade. For two years the West Indian Day Parade was successfully broadcast on WNBC. The Hispanic Heritage Awards aired on NBC4 for more than two years in a row, while the Hurricane George Relief Fund ran on NBC4, in addition to other NBC O&O's. More recently, the United Negro College Fund telethon received four hours of uninterrupted air-time on the station.

I have trained, supported and mentored many interns – minority and white. Currently, I am assisting an intern from the Emma L Bowen Foundation in my department.

Rokia Smith 3/16/99

EXHIBIT 20

DECLARATION OF JEFFREY H. SMULYAN

I, Jeff Smulyan, respectfully state as follows:

I am Chairman of the Board of Indianapolis-based Emmis Communications Corporation. I feel that we as an industry have an obligation to build greater minority participation in ~~management and throughout the ranks of the company~~ *our companies*. This is difficult. First you have to convince minorities to come into the industry. As an industry we are not good about recruiting people into the business, there is no history of recruiting in colleges. The telecommunications business tends to be an entrepreneurial business. Although recruitment is foreign to their nature, most broadcasters are sensitive to the issue of diversity. I do not believe that there is any nefarious reason for the lack of minorities in the business, but a lot of it is simple supply and demand. The pool of people already in the business are nonminority. The industry has made an effort but the whole outreach notion is a foreign one. We as an industry have to be better at attracting minorities because we don't have enough of them in the talent pool.

Our radio stations in New York and Los Angeles are both run by women. Many women entered the work pool twenty years ago and they are now rising through the ranks. This is not true for minorities. When we do get minorities in the workplace, they will move up like women have. I think that we are more progressive than most.

Almost every general manager comes up through the ranks from sales. Ninety percent of the time if we can get minorities in the business, they will move up. Most companies will give minorities a fair chance. Radio stations tend to promote generally from within. The hard part of this industry is that you really have to want to be in it.

More nonminorities want to be in the industry for some reason. There is not much of a glass ceiling especially for women ^{or} ~~than~~ African-Americans or Hispanics in the mid-levels. In the next level of station managers the difference is dramatic. In our company a woman is next in line to replace the president in our radio division. Our concern is to find the best people to fill the job.

A lot of people get their start in smaller markets where it is harder to recruit minorities because there is not a diverse population base and there is no formal recruitment process. The dilemma is how do you take an industry that is not good at recruiting in general, with so much turnover and low pay, to bring in minorities? Most recruitment by broadcasters is done in their own communities.

It is impossible to have a station without members of the target audience. You have to be able to understand and serve your audience. We are all a product of all our experiences, and therefore interactions with minorities on the job do influence the approach to programming decisions. I believe bringing the tax certificate back is the key to increasing minority broadcast ownership. Minority entrepreneurs are just like majority ones, once assets rise, most take the money and run. A lot of minority and majority entrepreneurs cash out. We have to do a better job dealing with this.

March 17, 1999

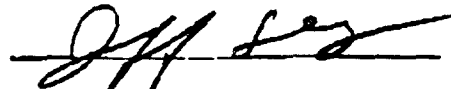

Jeffrey H. Smulyan

EXHIBIT 21

STATEMENT OF DENNIS SWANSON

I am currently President of WNBC in New York, a position I have held since 1996. In addition to my duties managing the television station, I am also Co-Chairman of NBC Olympics. This document reflects my personal views, opinions and experience and is in no way intended to represent the views or opinions of my employer, the National Broadcasting Company.

I began my career in broadcasting in 1959 at the student radio station at the University of Illinois. I began my commercial career at the WMT stations in Cedar Rapids, Iowa in 1964, where I worked performing a wide range of functions in news and sports on both radio and television. I then moved to Chicago where I worked for both network and local radio and television stations doing a number of jobs including news reporting, editing and producing. In 1974 I became news director for Television News Incorporated

I then made my way up the broadcast management ladder, holding positions as station manager of WLS-TV in Chicago, President of the ABC-owned television stations, President of ABC Sports as well as President of ABC Daytime and ABC Children's Programming. As noted above, I joined NBC in 1996.

I believe that most people in the broadcast industry have had similar career paths in that they got their start in an entry-level position and then work their way up the ladder. I believe that many people in this industry have started in small market radio where the total number of employees would be less than 10.

I believe that a broadcast station which programs to a diverse audience has a responsibility to present a variety of views and opinions. Maintaining a diversified workforce helps to meet this goal. We are all products of our environment and our attitudes and opinions reflect that environment. Hopefully, a station's workforce will reflect the population it is servicing. I believe this is a "win-win" situation because our business is determined by ratings and a broader audience should translate to financial success.

Whether a station's employee diversity will have an impact on the station's programming and operations ultimately will depend on upper level management's ability to take input from a wide variety of sources within his or her broadcast operation. The wider the range of input (i.e. part-time and freelance employees as well as regular staff), the more intelligent and informed the decision making should become.

I believe that having a diversified staff at the department head level has helped WNBC be more conscientious towards a wider range of programming and news views. Our news director is an African-American woman, and our station relations director is a Latina woman. Both exert strong influences on our station's on-air content. In addition,

minority news reporters, such as Ti Hua Chang, raise our level of sensitivity to minority communities.

I believe that anyone who has the requisite financial resources can enter the broadcast industry as an owner. While a broadcasting background is not a prerequisite to broadcast ownership, it certainly is beneficial. This is a hands-on business and the more practical experience an individual gets, the better the long-term results. Experience can come both through education as well as on-the-job training. I think that a financial institution or lender would feel more comfortable with an owner who has broadcast experience.

I have helped a number of people in this industry over the forty years I have been involved in it. Many have been minorities. Some had the advantage of other training and educational opportunities while some did not. I think we all have some obligation to help others just as there were those who helped or assisted us along the way.

Dennis Swanson / CO

3/16/99

EXHIBIT 22

DECLARATION OF JAMES L. WINSTON

I, James L. Winston, respectfully state as follows:

I am the Executive Director and General Counsel of the National Association of Black Owned Broadcasters ("NABOB"). NABOB represents the interests of African American owned radio and television stations.

Black owned broadcasting stations are proud to be the very best EEO "supercompliers" in the industry. To the best of my knowledge, not one of the approximately 200 Black owned broadcasting stations has ever received any kind of EEO sanction. Also, to the best of my knowledge, none has ever been the subject of an FCC EEO Branch staff investigation pursuant to Bilingual Bicultural Coalition on the Mass Media v. FCC, 595 F.2d 621 (D.C. Cir. 1978). In no segment of the industry do minorities have a better chance for career development than in Black owned broadcasting stations.

Since becoming Executive Director of NABOB in 1982, I have heard Black station owners identify numerous critical concerns: lack of access to capital, discrimination by financial institutions, discriminatory audience measurement methods by ratings services, discrimination by advertisers, the loss of the FCC's tax certificate policy, the continuing erosion of the Commission's multiple ownership rules, and many others. I have never heard a Black station owner identify EEO compliance or recordkeeping responsibilities as a "burden."

Black owned stations are frequently the first point of entry for African Americans and other minority persons seeking to break into broadcasting, but we cannot hire and train all of the minorities seeking to enter this business. Black station owners

see effective EEO enforcement as an important impetus for the growth of African American ownership. If the Commission does not continue to require nonminority owned stations to recruit, train and promote minorities, there will be an inadequate pool of experienced media professionals to move up into key management positions at our stations or to become owners themselves.

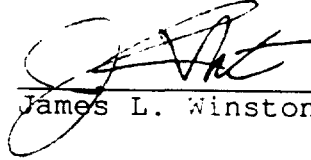
The loss of the tax certificate policy in 1995 and the multiple ownership provisions in the 1996 Telecommunications Act have placed intense competitive pressure on minority station owners. These developments have caused minority owners to lose many of our stations and to lose innumerable opportunities to acquire new ones.

Black owned broadcasters would be profoundly burdened by any cutback in EEO enforcement:

- Nonminority broadcasters will have fewer incentives to train African Americans and other minorities for broadcast careers. This responsibility -- and the attendant costs -- will fall even more heavily on Black owned broadcasters, who are already doing more than their share of this training.
- The pool of African American professionals available to us when we wish to hire experienced African American managers of our stations will become even smaller than it is now.
- The number of African Americans with top management experience transferable to entrepreneurship will decline over time, yielding an even smaller pool of future African American station owners.

In addition, the loss of experienced African American broadcast professionals is not only a loss to Black owned broadcast stations, it is a loss to all Americans. It deprives the American public of the skilled and capable persons needed to achieve the full range of ideas and viewpoints required to assure the benefits of the First Amendment for all Americans.

The National Association of Black Owned Broadcasters speaks in harmony with this nation's leading civil rights organizations in endorsing the FCC's proposal to restore broadcasters' duty to recruit minorities and women aggressively whenever jobs are open.



James L. Winston

March 5, 1999